

## REMARKS

Applicant has carefully considered the Final Rejection of October 23, 2002 rejecting claims 6-24. Applicant wishes to express his appreciation to the Examiner for the telephone interview conducted with the undersigned on January 8, 2003.

The present response is intended to be fully responsive to all points of rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application are respectfully requested.

Claim 6 has been amended. Claims 1-5 have not been elected. Claims 6-24 remain in the case.

It is the object of the present invention to provide a pre-treatment liquid used to treat an anodized aluminum plate that interacts immediately, both chemically and physically, with the CTP liquid to form a stable image with no clustering phenomenon. In this way, the image quality on the plate and the speed of plate preparation can be improved.

The pre-treatment liquid comprises an ion donor and a polymer swelling reagent and/or a coalescence reagent. The liquid can be provided as an aqueous and/or alcoholic solution or an oil in water emulsion (where the oil is a non-miscible swelling reagent). The swelling reagent and/or coalescence reagent as well as the ion donor are physically well localized in the porous structure of the plate's surface. The ion donor may be present as either an inorganic acid or a polyvalent metallic salt. The polyvalent metallic ions include anions and cations. The swelling and/or coalescence reagent enables the creation of a stable dot shape with good film properties and with very good adhesion to the anodized aluminum surface.

These good film properties promote the mechanical stability of the dot and consequently of the image.

The Examiner has rejected claims 6, 7, 9-18, 22 and 23 under 35 USC 102(b) as being anticipated by Kukharskay et al (SU 1058453A).

The Examiner has rejected claims 6, 7, 9-12, 19, 22 and 23 under 35 USC 102(b) as being anticipated by Figov et al (GB 1,492,529

The Examiner has rejected claims 6-24 under 35 USC 102(b) as being anticipated by Matsumoto et al (US 5,064,649).

The Examiner has rejected claims 6-12 and 22-24 under 35 USC 102(b) as being anticipated by Gautier et al (US 4,540,448).

The Examiner has rejected claims 6, 7, 9-12 and 22-24 under 35 USC 102(b) as being anticipated by Herdt et al (US 6,121,219).

The Examiner has rejected claims 6, 7, 9-12, 19 and 22 under 35 USC 102(b) as being anticipated by Beggs et al (SU 6,017,968).

It is requested that the Examiner review the attached 37 CFR Sec. 1.132 affidavit for remarks by the Inventor in response to these prior art references.

The Examiner has stated that Applicant may not rely on the preamble to distinguish his claimed composition from that of the prior art. The present affidavit shows that it is not the preamble which distinguishes the claims, but the body of the claim itself.

The body of new claim 6 reads: "...an ion donor for providing mechanical stability of a printing plate image formed by a plurality of inkjet dots and at least one of a polymer swelling reagent and a coalescence reagent for creation of stable dot shape."

As explained at length in the attached Sec. 1.132 affidavit, the prior art references brought by the Examiner do not anticipate claim 6 in that they do not have both an ion donor and a coalescence or swelling reagent. Though the chemicals contained in the preparations recited in the cited prior art references may be similar to those in the present invention, they do not perform the functions recited in the claim.

The amendment to claim 6 does not represent new matter as it is clearly recited in the specification. The issue of the ion donor providing mechanical stability is stated on page 13, line 15, "A metal salt comprised of the metallic ions  $Zn^{2+}$  and  $Ca^{2+}$ , provides especially favorable results in terms of image mechanical stability." The concept of the polymer swelling reagent or the coalescence reagent providing creation of a stable dot shape is found on page 14, line 3, "The presence of a swelling/coalescence reagent enables the creation of stable dot shape 54."

Applicant has accepted the Examiner's suggestion to exclude additional ingredients by changing the transitional phrase "comprising" to "consisting essentially of".

In view of the foregoing amendments and remarks, all of the claims remaining in the application are deemed to be allowable. Further reconsideration and allowance of the application is respectfully requested at an early date.

Respectfully submitted,

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MARKED-UP VERSION OF THE AMENDMENTS

Claim 6 has been amended as follows:

6. (Once Amended) A pre-treatment liquid ~~for~~ used in  
preparation of a pre-treated recording medium for use in  
offset printing plate applications using direct inkjet  
CTP, said liquid ~~comprising~~ consisting essentially of:  
an ion donor for providing mechanical stability of a  
printing plate image formed by a plurality of inkjet dots  
and at least one of a polymer swelling reagent and a  
coalescence reagent for creation of stable dot shape.